



November 26, 2020

*Via ECF and courtesy copy via email:  
(ALCarterNYSDChambers@nysd.uscourts.gov)*

Honorable Andrew L. Carter, Jr.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 435  
New York, New York 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC#: \_\_\_\_\_  
DATE FILED: November 30, 2020

MEMO ENDORSED

**Re: 1:19-cv-02978-ALC and 1:20-cv-01791-ALC**  
***Plaintiffs' Request for Adjournment and Stay or Pre-Motion Conference***

Dear Judge Carter:

Our office, as counsel for Plaintiffs Hoechstetter, *et al.* in the above-referenced matter and in accordance with Your Honor's Individual Practices, writes to advise the Court of recent developments between the parties.

On July 30, 2020, the undersigned counsel for Plaintiffs together with counsel for Defendants Columbia University, *et al.* and New York Presbyterian Hospital executed an "Agreement" memorializing the parties' belief that "... it is in their mutual interest to pursue settlement of the Claims at this time" and "that the parties agree to proceed in good faith ...." Pursuant to the Agreement, and prior to the commencement of settlement discussions between the parties, Plaintiffs served upon Defendants Columbia University, *et al.* and New York Presbyterian Hospital Plaintiff questionnaires. As directed by the Court, on October 9, 2020 the parties submitted a joint letter update advising the Court of the status of negotiations and requesting a continued stay while the parties continued to negotiate. The Court directed a further status update on November 27, 2020 (Docket 76).

The parties wish to advise Your Honor that settlement negotiations continue. The parties anticipate holding several additional negotiation sessions in the coming weeks and months given that our mutual desire to work together toward achieving a fair resolution remains strong. As such, the parties respectfully ask for a continuance of the previously imposed stay in both actions, thereby allowing the parties to continue to explore an amicable resolution.

Thank you for your attention to this matter and consideration of the foregoing.

Very truly yours,

Adam P. Slater, Esq.  
Counsel for Plaintiffs  
Slater Slater Schulman LLP

HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

**cc: All Parties Via ECF**  
**Magistrate Judge Katharine H. Parker Via Email:**  
**Parker\_NYSDChambers@nysd.uscourts.gov**

**November 30, 2020**

The parties shall file a status letter  
by January 7, 2021.